

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

<p>PRUVIT VENTURES, INC.,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>AXCESS GLOBAL SCIENCES, LLC, and FOREVERGREEN INTERNATIONAL, LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Action No. 4:15-cv-00571-ALM-CAN</p> <p style="text-align: center;">AXCESS GLOBAL SCIENCES, LLC’S UNOPPOSED MOTION TO FILE UNDER SEAL (re Exhibit B to Axxess Global Sciences, LLC’s Motion for Judgment on the Pleadings Under Rules 9(b) and 12(c))</p>
<p>AXCESS GLOBAL SCIENCES, LLC, and AXCESS GLOBAL, LLC,</p> <p style="text-align: center;">Counterclaimants and Third-party Plaintiffs,</p> <p style="text-align: center;">vs.</p> <p>PRUVIT VENTURES, INC., LACORE LABS, LLC, TERRY LACORE, BRIAN UNDERWOOD, CHRISTOPHER N. HARDING, SAVIND, INC., and KETOTECH, INC.,</p> <p style="text-align: center;">Counterclaim and Third-party Defendants.</p>	<p style="text-align: center;">Honorable Judge Amos L. Mazzant</p>

Defendant and counterclaimant Axxess Global Sciences, LLC (“AGS”) hereby moves the Court for leave to file Exhibit B to “Axxess Global Sciences, LLC’s Motion for Judgment on the Pleadings Under Rules 9(b) and 12(c)” under seal. The exhibit includes an email sent from AGS to Pruvit which discloses the base formula for AGS’s ketogenic supplement, a product based on AGS’s licensed patents and know-how. Plaintiff Pruvit Ventures, Inc. has alleged in its amended complaint that AGS has breached a contract with AGS for failure to disclose this formula to it in

a timely fashion. The e-mail communication identified in Exhibit B conclusively refutes that contention. It also supports AGS's counterclaims that Pruvit (and others) breached confidentiality obligations to AGS and supports AGS's claims of trade secret misappropriation. The formula is highly confidential to AGS; thus, protection from public disclosure is sought.

A proposed order is submitted herewith.

DATED: October 26, 2015

By: /s/ Charles L. Roberts

Charles L. Roberts (*pro hac vice admission*)

WASATCH-IP, A PROFESSIONAL CORP.

2825 E. Cottonwood Parkway, Suite 500

Salt Lake City, Utah 84121

croberts@wasatch-ip.com

Phone: 801-292-5300

Facsimile: 801-506-6699

*Attorney for defendant and counterclaimant
Axxess Global Sciences, LLC and third-party
plaintiff Axxess Global, LLC*

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7, the undersigned certifies that counsel for Axxess Global Sciences, LLC and Plaintiff have conferred on the issues addressed herein. The Plaintiff does not oppose the relief sought in the Motion.

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2015, I caused a true and correct copy of the foregoing document to be filed with the Clerk of Court and served on all counsel of record via CM/ECF pursuant to Local Rule CV-5(a).

/s/ Charles L. Roberts